



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

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November 25, 2003

LETTER OF DEFICIENCY #WSEB 03-294
CERTIFIED MAIL #7099 3400 0002 9772 3002

Alton Hadley III
SAU 79
Gilmanton School District
PO Box 39
Gilmanton, NH 03237

Subject: Gilmanton - Public Water System: Gilmanton Elementary School (EPA #0895010)

Dear Mr. Hadley:

The records of the Department of Environmental Services (DES) show that Gilmanton Elementary School water system is classified as a public water system (PWS), as defined by RSA 485:1-a. A PWS is defined as any water system serving 15 or more services, or 25 or more people for 60 or more days per year. As such, the water system owner is required to submit samples to the State laboratory or a State-certified laboratory for coliform bacteria analysis in compliance with NH Administrative Rule Env-Ws 325.

DES records show that a Standard Maximum Contaminant Level (MCL) violation for total coliform bacteria, as defined in NH Admin. Rule Env-Ws 315.01, has occurred and that a letter of violation has been issued for November 2003. In addition, the water system was placed on a Boil Order due to the presence of *E. coli* bacteria in August 2003. The system's water quality for September 2003 is unknown because the required bacteria sample for that month was not collected. The system's October 2003 routine sample showed the presence of total coliform bacteria, although the four October repeat samples were clean.

A further review of DES records indicates that in the two year period of October 1998 to October 2000, the school incurred six bacteria MCL violations. Although specific causes have been given for many of the bacteria contamination episodes (e.g., use of untreated lake water to refill an empty tank, contamination of the system caused by the repair of a storage tank float valve, a filler cap broken by a snowplow, etc.), nearly every episode lasts two to three months. This overall history causes DES to question the manner in which the water system is operated and the resulting ability of the water system to reliably and consistently distribute safe drinking water.

DES believes the MCL violations can be corrected and future violations prevented by taking the following actions:

- 1 **By December 12, 2003**, retain the services of a qualified water system consultant to evaluate the water system's operation, specifically including maintenance/inspection procedures, school year start-up procedures, and the response to positive bacteria samples; and

2. **By January 2, 2004**, submit to DES for review a copy of the consultant's report, which should include findings and recommendations; and
3. **By January 23, 2004**, submit to DES for review and approval an implementation schedule which identifies specific dates by which the recommendations will be accomplished.

In the event compliance is not achieved within this period, DES may take further enforcement action, including issuing an order requiring the deficiencies be corrected, initiating an administrative fine proceeding and/or referring the matter to the NH Department of Justice for imposition of appropriate penalties.

The copy of the consultant's written report **and the implementation schedule** as requested above should be addressed as follows:

Alan Leach
Department of Environmental Services
Water Supply Engineering Bureau
29 Hazen Drive, P.O. Box 95
Concord, NH 03302-0095

Please contact Alan Leach by phone at (603) 271-2854 or by e-mail at aleach@des.state.nh.us if you have any questions regarding this letter.

Sincerely,

COPY

Anthony P. Giunta, P.G., Administrator
Water Supply Engineering Bureau

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cc: Gretchen Rule, DES Legal Unit
Town of Gilmanton Health Officer
Norman Harris, III, Gilford Well Co., Primary Operator
EPA Region I